

REMARKS

Applicant respectfully requests reconsideration and allowance of the subject application. Claims 19, 23, 31, 36-39, 48, 51, 53, 54, 67, 74, and 80 are amended. Claims 40 and 68 are canceled without prejudice. Claims 19-26, 29-39, 41, 47-54, 60-64, 67, 69-81, and 87 are pending in this application.

The Specification

The specification has been amended as suggested in the January 14, 2005 Office Action.

35 U.S.C. § 101

Claims 19-40 stand rejected under 35 U.S.C. §101, asserting that claims 19-40 are directed to non-statutory subject matter, and that claims 19-40 are referring solely to abstract manipulation of data. Applicant respectfully disagrees. Nonetheless, in order to expedite prosecution, Applicant has amended claim 19 to further clarify that claim 19 is directed to statutory subject matter. Given that claims 20-26 and 29-41 depend from claim 19, Applicant respectfully submits that claims 20-26 and 29-41 are also directed to statutory subject matter.

Applicant respectfully requests that the §101 rejections be withdrawn.

35 U.S.C. § 112, 1st Paragraph

Claims 40 and 68 stand rejected under 35 U.S.C. §112, first paragraph. Applicant respectfully disagrees, and submits that claims 40 and 68 do comply

with 35 U.S.C. §112, first paragraph. Nonetheless, in order to expedite prosecution, Applicant has canceled claims 40 and 68 without prejudice.

Applicant respectfully requests that the §112 rejections be withdrawn.

35 U.S.C. § 112, 2nd Paragraph

Claims 19-26, 29-41, 47-54, 60-64, 67-81, and 87 stand rejected under 35 U.S.C. §112, second paragraph.

In the January 14, 2005 Office Action at p. 3, it was asserted that in claims 19, 48, and 67, “the encoded identifier” lacks antecedent basis. Applicant respectfully submits that “the encoded identifier” is clear. Nonetheless, in order to expedite prosecution, Applicant has amended claims 19, 48, and 67 to further clarify this language.

In the January 14, 2005 Office Action at p. 4, it was asserted that in claims 29, 50, and 72, “if the identifier is equal to one of the plurality of illegal identifiers followed by one or more particular characters, then using as the mapped identifier the identifier with one of the particular characters removed” is not clear. Applicant respectfully disagrees and asserts that the language of claims 29, 50, and 72 is clear.

An example of generating a mapped identifier can be found in the specification at p. 14, line 21 – p. 15, line 20. As illustrated in this example, “CON” is an illegal input name but “CON_” is a legal input name, even though the input name “CON_” corresponds to a mapped name of “CON”. With respect to claim 29, situations can arise where the identifier is equal to one of the plurality of illegal identifiers followed by one or more particular characters (“CON_” is an

example of such a situation), and the mapped identifier (having one of the particular characters removed) is equal to one of the plurality of illegal identifiers. The checking for illegal identifiers is performed for the received identifier, not for the mapped identifier.

In the January 14, 2005 Office Action at p. 4, it was further asserted that “if the identifier is not equal to one of the plurality of illegal identifiers followed by one or more particular characters, then using the identifier as the mapped identifier” is not clear, and that in particular, the significance of “followed by one or more particular characters” is not understood. Applicant respectfully disagrees and submits that this language is clear. The language “followed by one or more particular characters” refers to one or more particular characters following an illegal identifier. For example, referring to the specification at p. 14, line 21 – p. 15, line 20, “CON_” would be the illegal identifier “CON” followed by one particular character (an underscore). Another example is illustrated in the first paragraph on p. 4 of the January 14, 2005 Office Action assuming “copy” is an illegal identifier, where “copy” is followed by a particular character (an underscore). Accordingly, Applicant respectfully submits that this language of claim 29 is clear.

In the January 14, 2005 Office Action at p. 4, it was further asserted that in claims 29, 50, and 72, “if the identifier is not equal to one of the plurality of illegal identifiers, then checking whether the identifier is equal to one of the plurality of illegal identifiers followed by one or more particular characters” is not very clear. It was further asserted that the statement suggests that the identifier can be both:

equal and not equal to one of the plurality of illegal identifiers. Applicant respectfully disagrees. Claim 29 recites (emphasis added):

if the identifier is **not equal to one of the plurality of illegal identifiers**, then checking whether the identifier is **equal to one of the plurality of illegal identifiers followed by one or more particular characters**;

The language does not state that an identifier can be both equal and not equal to one of the plurality of illegal identifiers. The first clause of this language refers to “one of the plurality of illegal identifiers”, while the second clause of this language refers to “one of the plurality of illegal identifiers followed by one or more particular characters”. Thus, the checking is performed if the identifier is not equal to one of the plurality of illegal identifiers, and this checking is checking whether the identifier is equal to **one of the plurality of illegal identifiers followed by one or more particular characters**. Accordingly, Applicant respectfully submits that this language of claim 29 is clear.

Applicant respectfully submits that claims 50 and 72 are also clear for analogous reasons.

In the January 14, 2005 Office Action at p. 5, it was asserted that in claims 21-22, 49, and 69, “decasifying” is not understood. Applicant respectfully asserts that the language of claims 21-22, 49, and 69, including a “decasified identifier” is clear.

As indicated in the specification at p. 12, lines 15-16, a decasified name is, for example, a name where the case of the characters has no importance. As illustrated in the example, on page 18, lines 7-9, the input name “Memo.doc” would output as the decasified name “MEMO.DOC”. In the process illustrated in Fig. 7, and discussed in the specification at, for example, p. 16, line 2 – p. 18, line

15, a check is made in act 286 of whether the selected character is not a lower-case character (see, p. 17, lines 19-20). If the selected character is not a lower-case character then the selected character is appended to the *L* string, but if the selected character is a lower-case character, then the upper-case form of the selected character is appended to the *L* string (see, p. 17, line 24 – p. 18, line 4). A symbol that has no case distinction would not be a lower-case character, and would be appended to the *L* string (see, p. 17, lines 20-23). Thus, the specification describes that a decasified identifier can include characters that have no case distinction (such as a period, an asterisk, and so on). Accordingly, Applicant respectfully submits that this language of claims 21-22, 49, and 69 is clear.

In the January 14, 2005 Office Action at p. 5, it was asserted that in claims 31, 36, 51, 53, 72, and 74, “the order of characters”, “the reversed identifier”, “the next character” and “the encoded next character” lack antecedent basis. Applicant respectfully submits that this language is clear. Nonetheless, in order to expedite prosecution, Applicant has amended claims 31, 36, 51, 53, and 74 to further clarify this language. With respect to claim 72, claim 72 does not include this language and thus has not been amended.

In the January 14, 2005 Office Action at p. 5, it was asserted that in claims 47, 60, and 87 referring to the encrypting process allowing verifying an entry without decrypting the encrypted entry is not understood. It was further asserted that it is not clear whether the language as stated refers to the authentication of an entry or simply to the fact that two encrypted entries can be compared. Applicant respectfully disagrees and asserts that the language of claims 47, 60, and 87 is clear.

The cited language of claim 47 is:

wherein the encrypting allows another device to verify, without decrypting the ciphertext, that the plaintext identifier is not identical to another plaintext identifier maintained by the other device.

Applicant respectfully submits that it is clear that this language refers to the encrypting allows another device to verify that the plaintext identifier is not identical to another plaintext identifier maintained by the other device – the other device can verify that the plaintext identifier is not identical to another plaintext identifier. Further, this verification is performed without decrypting the ciphertext. Accordingly, Applicant respectfully submits that this language of claim 47 is clear. Applicant respectfully submits that claims 60 and 87 are also clear for analogous reasons.

Applicant respectfully requests that the §112 rejections be withdrawn.

Claims Having No Art Rejection

Applicant notes that no art rejection of claims 31-36, 51-53, and 74-79 has been made. Claims 31-36 were rejected under 35 U.S.C. §101. Claims 51-53 and 74-79 were rejected under 35 U.S.C. §112, second paragraph. As these rejections under 35 U.S.C. §101 and §112, second paragraph have been resolved as discussed above, Applicant respectfully submits that claims 31-36, 51-53, and 74-79 are in condition for allowance.

35 U.S.C. § 103

Claims 19-30, 37-39, 41-48, 50, 54, 60-64, 67, 70-73, 80-81, and 87 stand rejected under 35 U.S.C. §103(a) as being unpatentable over “ISU”

(<http://www.isu.edu/departments/comcom/unix/workshop/>) in view of U.S. Patent Publication No. 2003/0046533 to Olkin et al. and in further view of Official Notice. Claims 21-24, 49, and 69 stand rejected under 35 U.S.C. §103(a) as being unpatentable over ISU in view of U.S. Patent Publication No. 2003/0046533 to Olkin et al. and in further view of U.S. Patent Publication No. 2002/0088011 to Lamkin et al. and Official Notice.

The ISU reference is a three-page reference showing dates of 1/12/05 and 12/25/04. There is no indication on the ISU reference of any date earlier than 12/25/04. The Form PTO-892 accompanying the January 14, 2005 Office Action does not list any date for the ISU reference. Accordingly, respectfully submits that there is no showing that the ISU reference has a date earlier than the January 17, 2001 filing date of the present application, and thus no showing that the ISU reference is prior art as to the present application.

All of the rejections under 35 U.S.C. §103(a) rely on the ISU reference. As there is no showing that the ISU reference is prior art as to the present application, Applicant respectfully submits that the ISU reference is not a useable reference against the present application, and respectfully requests that the 35 U.S.C. §103(a) rejections of claims 19-30, 37-39, 41-49, 50, 54, 60-64, 67, 69-73, 80-81, and 87 be withdrawn.

Conclusion

Claims 19-26, 29-39, 41, 47-54, 60-64, 67, 69-81, and 87 are in condition for allowance. Applicant respectfully requests reconsideration and issuance of the subject application. Should any matter in this case remain unresolved, the

undersigned attorney respectfully requests a telephone conference with the Examiner to resolve any such outstanding matter.

Respectfully Submitted,

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By: ATS

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